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**US DISTRICT COURT  
DISTRICT OF NEVADA**

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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 CALEB MITCHELL ROGERS,

13 Defendant.

Case No. 2:22-mj-00165-NJK

**COMPLAINT** for violations of:

COUNT ONE:

18 U.S.C. § 1951 – Interference with  
Commerce by Robbery

COUNT TWO:

18 U.S.C. § 924(c)(1)(A)(ii) – Brandishing  
a Firearm During and in Relation to a  
Crime of Violence

17 BEFORE the Honorable Nancy J. Koppe, United States Magistrate Judge, in Las  
18 Vegas, Nevada, the undersigned Complainant, being duly sworn, deposes and states:

19 COUNT ONE

Interference with Commerce by Robbery  
20 18 U.S.C. § 1951

21 On or about February 27, 2022, in the State and Federal District of Nevada,

22 CALEB MITCHELL ROGERS,

23 defendant herein, unlawfully obstructed, delayed, and affected, and attempted to obstruct,  
24 delay, and affect commerce as that term is defined in Title 18, United States Code, Section

1 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery  
2 as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the  
3 defendant did unlawfully take and obtain property, that is, approximately seventy eight  
4 thousand eight hundred ninety eight dollars (\$78,898.00) in United States currency, from  
5 the person and in the presence of an employee and agent of Rio All-Suite Hotel and  
6 Casino, located at 3700 West Flamingo Road in Las Vegas, Nevada, against the will of  
7 said employee and agent, and by means of actual and threatened force, violence, and fear  
8 of injury, immediate or future, to the person of said employee and agent, all in violation of  
9 Title 18, United States Code, Section 1951.

10 COUNT TWO

11 Brandishing a Firearm During and In Relation to a Crime of Violence  
12 18 U.S.C. § 924(c)

13 On or about February 27, 2022, in the State and Federal District of Nevada,

14 CALEB MITCHELL ROGERS,

15 defendant herein, during and in relation to the crime of violence charged in Count One of  
16 this Complaint, knowingly and intentionally carried and used a firearm, to wit: a Sturm,  
17 Ruger & Company model SP101 .357 caliber revolver bearing serial number 57309886,  
18 said firearm being brandished; all in violation of Title 18, United States Code, Section  
19 924(c)(1)(A)(ii).

20 PROBABLE CAUSE AFFIDAVIT

21 Your Complainant, as a Special Agent with the Federal Bureau of Investigation,  
22 states the following as and for probable cause:

23 1. Your Complainant is a Special Agent with the Federal Bureau of  
24 Investigation (FBI), has been so employed since January 2019, and is currently assigned to  
the Las Vegas Field Office's Violent Crimes Task Force. Prior to this, your Complainant

1 was employed as a police officer for the City of North Las Vegas Police Department from  
2 2009 to 2011, and for the Western Illinois University Police Department from 2011 to  
3 2019. As an FBI Agent, your Complainant is assigned to the FBI's Las Vegas Violent  
4 Crimes Task Force and is responsible for investigating a variety of violent crimes, to  
5 include: Bank robbery, kidnapping, extortion, Hobbs Act robbery, carjacking, assaults and  
6 murders of federal officers, racketeering related violent offenses, as well as long-term  
7 investigations into the activities and operations of career criminals, criminal enterprises,  
8 drug trafficking organizations, and violent street gangs. Your Complainant has experience  
9 in conducting criminal investigations, including the investigation of criminal groups and  
10 conspiracies, as well as the collection of evidence and the identification and use of  
11 witnesses.

12 2. The information used to support this Complaint was derived from reports of  
13 information obtained from eyewitnesses to the offenses described herein as well as  
14 investigations conducted by law enforcement related to the incidents. This Complaint  
15 contains information necessary to support probable cause to believe that the criminal  
16 offenses described herein were committed by the defendant, CALEB MITCHELL  
17 ROGERS, and is not intended to include each and every fact and matter observed or  
18 known by me. Moreover, to the extent that this Complaint contains statements by  
19 witnesses, those statements are set forth only in part and in substance and are intended to  
20 accurately convey the information, but not to be verbatim recitations.

21 **FACTS ESTABLISHING PROBABLE CAUSE**

22 3. Law enforcement, investigating a series of business robberies occurring in  
23 Southern Nevada between November 12, 2021, and February 27, 2022, came to believe  
24 that one man, later identified as CALEB MITCHELL ROGERS (ROGERS), was the

1 perpetrator in three business robberies in Las Vegas and North Las Vegas, Nevada. As  
2 recorded on security video and described by witnesses, the man was a white male adult  
3 that stood approximately 5'8" tall, had a medium build, walked with a unique gait where  
4 his left leg kicked forward, and appeared to be between 30 and 40 years old. In each of the  
5 robberies, the *modus operandi* was essentially the same. Additionally, although ROGERS  
6 appeared to wear somewhat different items of clothing during each robbery, the style of  
7 clothing was consistent across all three robberies. ROGERS also wore black latex gloves  
8 during each of the three robberies.

9       4.     At approximately 3:38 a.m. on November 12, 2021, a man later identified  
10 as ROGERS robbed the Red Rock Resort and Casino, located in the western part of the  
11 Las Vegas Valley at 11011 West Charleston Boulevard in Las Vegas, Nevada, of  
12 approximately \$73,810 in U.S. currency. ROGERS arrived at the location in a pick-up  
13 truck style vehicle that had been covered with what appeared to be trash bags but showing  
14 some areas of orange paint. ROGERS parked near the East pool entrance and entered the  
15 casino wearing dark colored clothing, a full-face mask, and black latex gloves. ROGERS  
16 walked directly to the casino's cashier cage and demanded money from the cashier. The  
17 cashier, T.K., believed that ROGERS was armed due to ROGERS' body language and  
18 specifically that ROGERS kept his hand in his pocket during the demand for money.  
19 Fearing for her safety and the safety of others, the cashier, an agent and employee of Red  
20 Rock Resort and Casino, complied with ROGERS' demand, handing over approximately  
21 \$73,810 in U.S. currency, much of it in banded bundles of \$20 and \$100 bills, the property  
22 of the Red Rock Resort and Casino. ROGERS placed the money into a bag concealed  
23 inside his jacket then left the casino back through the East pool entrance.

1           5.       A review of security video recordings showed ROGERS had a unique gait,  
2 appearing to kick out his left foot and leg as he walked through the casino. ROGERS also  
3 appeared to have difficulty running from security because of a problem with his leg. As  
4 recorded on security video, ROGERS ran to the pick-up truck style vehicle that had been  
5 covered with what appeared to be trash bags but showing some areas of orange paint.  
6 Security video recordings show the pick-up truck style vehicle moving West on Charleston  
7 Boulevard, then turning North onto Clark County Route 215, also known as the Bruce  
8 Woodbury Beltway, heading toward the northwest part of the Las Vegas Valley.

9           6.       The Red Rock Resort and Casino is a commercial business, providing  
10 lodging, gaming, dining and entertainment. Persons travel from throughout the United  
11 States and abroad to visit and stay in the hotel and casino, purchasing meals and goods,  
12 participating in gaming, and viewing entertainment. Many of the goods sold by the Red  
13 Rock Resort and Casino, such as agricultural, alcohol, and tobacco products, are obtained  
14 from other states or abroad, shipped in interstate or international commerce to be sold in  
15 Nevada. The funds of the Red Rock Resort and Casino pass through the interstate and  
16 international banking systems. As a result of the robbery, interstate commerce was also  
17 delayed, obstructed, and affected because, in among other ways, the Red Rock Resort and  
18 Casino cashier cage closed for several hours as a result of the robbery.

19           7.       At approximately 4:26 a.m. on January 6, 2022, a man later identified as  
20 ROGERS robbed the Aliante + Casino + Hotel + Spa, located in the northern part of the  
21 Las Vegas Valley at 7300 Aliante Parkway, North Las Vegas, Nevada, of approximately  
22 \$11,500 in U.S. currency. ROGERS drove a white-color Volkswagen hatchback or station  
23 wagon type vehicle to the casino and backed it into a parking space designated for persons  
24 who are handicapped, close to a casino entrance. ROGERS entered the casino wearing

1 dark colored clothing, a full-face mask, and black latex gloves. ROGERS walked directly  
2 to the casino's cashier cage. ROGERS demanded money from the cashier, an agent and  
3 employee of Aliante + Casino + Hotel + Spa. The cashier, J.F., believed that ROGERS  
4 was armed due to ROGERS' body language, particularly the fact that ROGERS kept his  
5 hand in his pocket when he made his demand. Fearing for his safety and the safety of  
6 others, the cashier complied with ROGERS' demand, handing over approximately  
7 \$11,500 in U.S. currency, much of it in banded bundles of \$100 bills, the property of  
8 Aliante + Casino + Hotel + Spa. ROGERS placed the money inside a bag he had inside  
9 of his jacket. ROGERS left through the valet entrance doors and ran through the parking  
10 lot towards the white Volkswagen. ROGERS left the parking lot in the Volkswagen,  
11 driving out onto Aliante Parkway where casino security lost sight of the vehicle.

12 8. A review of video surveillance showed ROGERS walked with the same  
13 unique gait as he had during the Red Rock Casino robbery, kicking out his left foot and  
14 leg as he walked through the parking lot and casino. ROGERS again appeared to have  
15 trouble running because of a problem with his leg. Some of ROGERS' facial features were  
16 also visible, showing an elongated nose, and thick, dark eyebrows. Cameras showed the  
17 white-color hatchback or station wagon type Volkswagen moving South along Aliante  
18 Parkway, then turning West onto Clark County Route 215, also known as the Bruce  
19 Woodbury Beltway, heading toward the northwest part of the Las Vegas Valley.

20 9. The Aliante + Casino + Hotel + Spa is a commercial business, providing  
21 lodging, gaming, dining, and entertainment. Persons travel from throughout the United  
22 States and abroad to visit and stay in the hotel and casino, purchasing meals and goods,  
23 participating in gaming and viewing entertainment. Many of the goods sold by the Aliante  
24 + Casino + Hotel + Spa, such as agricultural, alcohol, and tobacco products, are obtained

1 from other states or abroad, shipped in interstate or international commerce to be sold in  
2 Nevada. The funds of the Aliante + Casino + Hotel + Spa pass through the interstate and  
3 international banking systems. As a result of the robbery, interstate commerce was also  
4 delayed, obstructed, and affected because, in among other ways, the Aliante + Casino +  
5 Hotel + Spa cashier cage closed for several hours as a result of the robbery.

6       10. At approximately 6:56 a.m. on Sunday, February 27, 2022, ROGERS  
7 robbed the sportsbook inside the Rio All-Suite Hotel and Casino. As recorded on security  
8 video, ROGERS entered the Rio All-Suite Hotel and Casino, located in the central part of  
9 the Las Vegas valley at 3700 West Flamingo Road in Las Vegas, Nevada, wearing dark-  
10 color clothing, a blue face mask, and black latex gloves. ROGERS walked from an  
11 entrance to the sportsbook with his hands in his pockets the entire time. Two casino  
12 employees, P.D. and S.M., were loading U.S. currency, the property of the Rio All-Suite  
13 Hotel and Casino, into the cash drawers of the sportsbook area, preparing for business that  
14 day. Sunday, February 27, 2022, would feature eight NBA games and eight NHL  
15 matches, among many other contests. As the employees, both women, employees and  
16 agents of the Rio All-Suite Hotel and Casino, transferred the money from a bag into the  
17 cash drawers, ROGERS ran toward them, yelling "Get away from the money. I've got a  
18 gun. I will shoot you!" or words to that effect. ROGERS climbed over the counter,  
19 grabbed one of the women by her shoulders with both hands, and shoved her to the floor.  
20 The woman ROGERS shoved to the ground was then more than 60 years old. ROGERS  
21 then yelled repeatedly, "This isn't your money, it's not worth losing your life over it!" or  
22 words to that effect, as he grabbed money from the cash drawer with his right hand and  
23 placed it into a bag inside his jacket. Some cash fell to the floor while ROGERS was  
24 emptying the drawer. Fearing for their safety and the safety of others, the cashiers, P.D.

1 and S.M., did not directly interfere with ROGERS as he took the money from them, but  
2 instead triggered robbery alarms from the floor. When ROGERS noticed one of the  
3 women triggering an alarm, he climbed back over the counter and ran through the casino  
4 with the stolen money in his jacket. Rio All-Suite Hotel and Casino security, alerted by the  
5 alarms, gave chase, following ROGERS as he ran out the west doors. Security Officer  
6 T.P. tackled ROGERS in a driveway of the casino as ROGERS ran toward the parking  
7 garage. Struggling to escape Security Officer T.P. as other Rio security personnel  
8 approached, ROGERS drew a silver-color revolver. Still struggling with Security Officer  
9 T.P. and brandishing the firearm with his finger inside the trigger guard and ready on the  
10 trigger, ROGERS asked the security officers, all employees and agents of Rio All-Suite  
11 Hotel and Casino, "Are you willing to be shot over this?" or words to that effect, and  
12 threatened, "I'm going to shoot you!" or words to that effect. In an effort to disarm  
13 ROGERS, Rio Security Officer T.P. moved towards ROGERS and grabbed the revolver  
14 in a way to prevented ROGERS from firing it at him, and wrenched it from ROGERS'  
15 grasp. The Rio security officers were able to restrain and then detain ROGERS until Las  
16 Vegas Metropolitan Police (Metro) officers arrived and took ROGERS into custody.

17 11. ROGERS verbally identified himself to Metro officers as "Rogers, P No.  
18 15666," giving his name and Metro identification number, a way police officers  
19 commonly identify themselves to one another. Metro officers then verified ROGERS'  
20 identity. ROGERS was employed as a police officer with the Las Vegas Metropolitan  
21 Police Department and had been for over five years. ROGERS is a white male adult, 33  
22 years old, 5'9" with a medium build. ROGERS' facial features matched those of the  
23 suspect in the Aliante Casino robbery. ROGERS had a black drawstring bag with the  
24 \$78,898 in U.S. currency, the property of Rio All-Suite Hotel and Casino, in his



1 possession, inside his jacket when Rio security tackled him, as in the prior two robberies.  
2 ROGERS also wore body armor during the robbery, which law enforcement discovered  
3 on his person when he was detained and arrested. ROGERS had no identification, cell  
4 phone, or other electronic devices on his person when detained and arrested.

5 12. Metro officers seized the firearm ROGERS used during the robbery, a silver  
6 and black Sturm, Ruger and Company model SP101 .357 caliber revolver. When officers  
7 recovered the firearm, they noted that ROGERS had covered the serial number,  
8 prominent on the right side of the frame above the trigger well, with a yellow-colored  
9 sticker. Checking the serial number, which was 57309886, officers learned that the firearm  
10 belonged to the Las Vegas Metropolitan Police Department and was checked out to  
11 ROGERS during the timeframe encompassed by the three robberies.

12 13. The Rio All-Suite Hotel and Casino is a commercial business, providing  
13 lodging, gaming, dining and entertainment. Persons travel from throughout the United  
14 States and abroad to visit and stay in the hotel and casino, purchasing meals and goods,  
15 participating in gaming and viewing entertainment. Many of the goods sold by the Rio  
16 All-Suite Hotel and Casino, such as agricultural, alcohol and tobacco products, are  
17 obtained from other states or abroad, shipped in interstate or international commerce to be  
18 sold in Nevada. Patrons of the sportsbook wager on sporting events that take place in  
19 other states and abroad. The funds of the Rio All-Suite Hotel and Casino pass through the  
20 interstate and international banking systems. As a result of the robbery, interstate  
21 commerce was also delayed, obstructed, and affected because, in among other ways, the  
22 Rio All-Suite Hotel and Casino sportsbook area closed as a result of the robbery.

23 14. A review of Rio All-Suite Hotel and Casino security video showed  
24 ROGERS had parked an unregistered blue-color Chevrolet Ventura van in a parking spot

1 in the Rio All-Suite Hotel and Casino parking garage. ROGERS backed the van into the  
2 parking space, got out of the van and walked into the casino to commit the robbery. Rio  
3 security cameras recorded ROGERS' actions from the time he entered the parking garage  
4 and parked the van to the time when he was taken into custody after the robbery. As  
5 shown in the security video recordings, ROGERS walked with the same unique gait he  
6 had displayed during the Red Rock Resort and Casino and Aliante + Casino + Hotel +  
7 Spa robberies, kicking out his left foot and leg as he walked through the parking garage  
8 and casino. As in the Red Rock and Aliante robberies, ROGERS appeared to have trouble  
9 running during the Rio Casino robbery because of a problem with his leg.

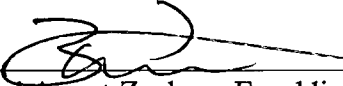
10 15. In a warned, recorded interview at LVMPD Headquarters, a Metro  
11 detective asked ROGERS whether there was anything that could have been done to  
12 prevent the robberies from happening. ROGERS responded "Nothing."

13 16. Investigators obtained a search warrant for ROGERS' residence at 9109  
14 Ripple Ridge Avenue, No. 102, in Las Vegas, Nevada, in the northwest part of the Las  
15 Vegas Valley. During the service of the search warrant, investigators located black latex  
16 gloves, paperwork which showed ROGERS owned a white-color 2014 Volkswagen Jetta  
17 Station-Wagen with a suspended Nevada registration GK733E, occupational injury forms  
18 from a 2019 knee injury ROGERS sustained, eviction paperwork, past-due notices, and  
19 demand letters.

## 20 CONCLUSION

21 17. Based upon the information set forth in this application, your Complainant  
22 respectfully submits that there is probable cause to believe that CALEB MITCHELL  
23 ROGERS violated 18 U.S.C. § 1951(a), Interference with Commerce by Robbery, and 18  
24

1 U.S.C. § 924(c)(1)(A)(ii), Brandishing a Firearm During and in Relation to a Crime of  
2 Violence, as described above.

3  
4   
5 Special Agent Zachary Franklin  
6 Federal Bureau of Investigation

7 Sworn and subscribed before me on March 4, 2022.

8   
9 THE HONORABLE NANCY J. KOPPE  
10 UNITED STATES MAGISTRATE JUDGE  
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